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Federal Communications Commission
Office of the Secretary
Washington, DC 20554

In the Matter of

Replacement of Part 90 by Part 88 to
Revise the Private Land Mobile Radio
Services and Modify the Policies
Governing Them

PR Docket No. 92-235

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COMMENTS ON: PR DOCKET NO. 92-235 PROPOSED RULE MAKING

I. Introduction

1. Routt County Communications is an intergovernmental agency formed by, funded by, and composed of all public agencies in the County of Routt, in the State of Colorado. Its main function is to provide all 28 agencies (Law enforcement, Fire service, Emergency medical service, Public works, Schools, State & Federal recreational agencies) with the the finest communication systems possible under current available funding. Working with this diverse group of communicators (Federal agencies all the way down to the one man police force) proves to be a technical impossibility at times but it is currently working.

2. The following comments on PR docket no. 92-235 are motivated by several overriding factors.

a. The majority of funding for this center is derived from small local governments with limited revenue. The state of Colorado and all local governments in the state are now under tax limitation legislation. This maintains current levels of service but to fund major changes requires a favorable vote of the electorate.

b. Although this communications center is currently serving the needs of the user agencies a majority of the equipment is 5 to 15 years old. Complete replacement is not possible under current funding. Most of the current equipment is not adaptable to the new purposed standards even though the purposed changes do not take effect for many years in this rural area.

c. The geographical terrain of Routt County is in the heart land of the Colorado Rocky Mountains which makes PLMR communications difficult at best and at times impossible.

3. The proposal in its current form would have devastating effects on all public safety communication systems within Routt County. The following comments and suggested remedies are made with the preceding factors as a basis of concern.

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II. COMMENTS

1. Perceived Problem:

In Routt County there are International Ski Resorts, and world famous hunting and fishing areas. This unique features attract visitors from all countries of the world. When the guest from other countries travel to Routt County they sometimes bring with them their communication equipment which is quite legal in their country but is operated illegally in this country, thus interfering with our public safety communications. To date all operators have ceased operation when contacted. Two perceived problems arise out out this situation.

- a. Spectrum compatibility with the federal and local governments of other countries. Under the purposed refarming when this situation occurs the illegal operator will interfere with up to 4

3. Perceived Problem:

Over 90% of the agencies this center serves and the centers communication equipment will not adapt to the new 1996 transmit and receive standards for various reasons. This will cost the tax payers of the county of Routt over \$500,000.00. Each agency will upgrade on a different time schedule.

Suggested Remedy:

Set the migration time table the same for all PLMR users but use a longer time period possible 7 to 10 years requiring all new equipment to be backwards compatible and then require all PLMR users to conform to the new spectrum at the same time. This will allow public safety users to realistically replace all equipment and comply with the requirements.

4. Perceived Problem:

The area covered by this center is mountainous. Approximately 75% of the county is covered with radio communications. The remainder is shielded by terrain. This situation is not easily corrected under the current regulations using high power transmitters. The purposed ERP/HAAT limitations will effectively shut down public safety communications in this county. Under the new regulations we would have to triple or quadruple the number of sites that we use for repeaters and remote bases. This is out of the question financially and also from a practical stand point. Many of the desirable transmit sites in Routt County are in National Forest much of which is wilderness area. To make matters worse it is the USFS current position to limit approved radio sites in the national forest.

Suggested Remedy:

Assign licenses by area and allow frequency coordination to set ERP/HAAT and use of directional antennas to cover only the licensed area. With the current state of the art computer systems this is a more realistic approach than the unworkable flat land approach used in the proposal.

5. Perceived Problem:

Much of the communications in this area uses repeaters because of the mountainous terrain. Section 88.231 is unclear as to the future of repeater operations.

Suggested Remedy:

Allow present repeater pairs to remain and make the language in 88.231 clear and concise.

III. POSITIVE EFFECTS

TRUNKING BELOW 800 MHz:

This is one of the most positive moves the commission has suggested. It should be implemented immediately. Just this one change could alleviate many of the frequency shortages in many areas of the country.

RULE SIMPLIFICATION:

Part 90 is outdated and bloated and needs to be updated. This must be carried out in organized an coordinated manner.

IV. CONCLUSIONS

Overall the concerns of this county communication center with the purposed rule making are as follows.

Cost to the tax payer.

Time to implement within budgetary constraints.

Interagency operability.

Stability of emergency communication plans.

System degradation.

The over all end result of the purposed rule making should enhance the use of PLMR for all users. As purposed We see very few advantages. It is the belief of this center that after the period for public input is over a clearer picture of what is needed will be available to the commission so that a revised rule making and proposal can be constructed.

Respectfully Submitted May 5, 1993



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